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December 15, 2016

VIA ECF AND OVERNIGHT MAIL

Hon. Lois H. Goodman, U.S.M.J.
United States District Court for the District of New Jersey
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
402 E. State Street, Room 7050
Trenton, New Jersey 08608

Re: Invokana (Canagliflozin) Products Liability Litigation
Docket No: 3:16-md-2750-BRM-LHG

Dear Judge Goodman:

I write on behalf of Defendants Janssen Pharmaceuticals, Inc. and Johnson & Johnson. The parties hereby agree to the entry of the signed Protective Order [3:16-cv-1787, Dkt. Entry 33] and Order Regarding Electronically Stored Information [3:16-cv-1787, Dkt. Entry 35] for use in MDL No. 3:16-md-2750.

Thank you for your consideration of this matter.

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

/s/ Michael C. Zogby

Michael C. Zogby

cc: Hon. Brian R. Martinotti, U.S.D.J. (via ECF)
Christopher A. Seeger, Esq. (via ECF)
Jeffrey S. Grand, Esq. (via ECF)
James E. Cecchi, Esq. (via ECF)
Michael A. London, Esq. (via ECF)
John Q. Lewis, Esq.
Mollie Benedict, Esq.

So Ordered this 16th day
of DECEMBER, 2016
